

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
RAQUEL LAZO
3 Assistant Federal Public Defender
Nevada State Bar No. 8540
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Raquel_Lazo@fd.org

7 Attorney for Cesar Osvaldo Flores-Padilla

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 CESAR OSVALDO FLORES-PADILLA,

15 Defendant.

Case No. 2:21-MJ-00461-EJY-1

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(Second Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Jared Grimmer, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Raquel Lazo, Assistant Federal Public Defender, counsel for Cesar Osvaldo Flores-Padilla, that
21 the Preliminary Hearing currently scheduled on September 23, 2021 at 4:00 pm, be vacated and
22 continued to a date and time convenient to the Court, but no sooner than one-hundred and
23 twenty (120) days.

24 This Stipulation is entered into for the following reasons:
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1 1. Mr. Flores's Waiver of Indictment, Filing of an Information, Initial Appearance
2 and Arraignment and Plea is currently scheduled for December 15, 2021. The requested time is
3 necessary to permit Mr. Flores to enter his plea.

4 2. Mr. Flores is incarcerated and does not object to a continuance.

5 3. Additionally, denial of this request for a continuance could result in a
6 miscarriage of justice.

7 This is the second request for continuance filed herein.

8 DATED this 8th day of September, 2021.

9
10 RENE L. VALLADARES
11 Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

12 /s/ Raquel Lazo
13 By _____
14 RAQUEL LAZO
15 Assistant Federal Public Defender

/s/ Jared Grimmer
By _____
JARED GRIMMER
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 CESAR OSVALDO FLORES-PADILLA,

7 Defendant.
8

Case No. 2:21-MJ-00461-EJY-1

ORDER

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10 Based on the Stipulation of counsel and good cause appearing,
11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
12 September 23, 2021 at the hour of 4:00 p.m., be vacated and continued to January 21, 2022 at
13 the hour of 4:00 p.m., in Courtroom 3C.

14 DATED this 8th day of September, 2021.

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17 UNITED STATES MAGISTRATE JUDGE